

# START



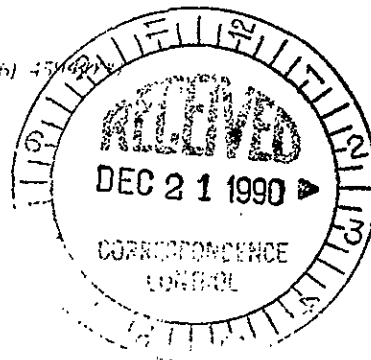
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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 457-6211

December 12, 1990



Mr. Steve Wisness  
Hanford Project Manager  
U.S. Department of Energy  
P.O. Box 550  
Richland, Washington 99352

Re: Hanford Interim Response Action Preliminary Proposals

Dear Mr. Wisness:

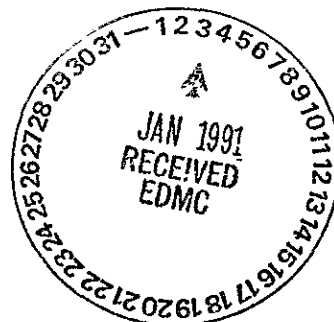
The following comments address the Hanford Interim Response Action Preliminary Proposals dated November 26, 1990, the DSI entitled "Expedited Response Action (ERA) Summary Packages" dated November 30, 1990, and the December 6, 1990 letter to Ecology and EPA referencing "Interim Response Actions".

As you know, Ecology has advocated and continues to support the goal of identifying candidate sites at Hanford for interim remedial actions. It was encouraging to learn that USDOE and EPA met in late September and early October to discuss this issue. It appears these meetings were productive, and have lead toward progress being made.

The parties to the Hanford Federal Facility Agreement and Consent Order are now at an important juncture in setting precedent for remedial activities at Hanford. We believe it is critical these activities are: 1) environmentally justified; 2) protective of human health; 3) technically correct; and 4) consistent with federal and state regulations, and the Agreement. The remainder of this letter documents general and specific concerns we have with the proposals that should be addressed prior to submittal of the formal proposals.

#### General Comments

- o The IRA selection process is subjective. The parties should agree upon a decision-making process that is consistent with the Agreement and the Hanford Past Practice Strategy. This process must include a methodology, criteria, quantification of the criteria and final evaluation.



The annotated outline in the proposal package notes in Section 4.0 that "the types of evaluation criteria utilized will be based on the EPA's 'Nine criteria for evaluation as listed in 40 CFR Part 300.430'." The criteria are presented, but the entire text is vague. How will these criteria be evaluated, applied and quantified?

We recommend using CERCLA and RCRA guidance and criteria to develop a single process for Hanford past practice sites. Most important, the agencies must agree what criteria will be used, and how those criteria will be quantified in order to provide a consistent, technically defensible process for defining potential areas needing interim action at Hanford.

The introduction references seven sites originally considered in the selection process. There is no mention for the record now or in the future, of how the three (four?) proposed projects were given a higher priority, and what sites are being deferred for further consideration. The original options need to be addressed. In addition to those sites deferred, Ecology believes additional sites to be reviewed in the near future should include, for example, the "pluto" cribs in the 100-NR-3 Operable Unit e.g., 116-D-2, and the cyanide plume associated with the 200-BP-1 Operable Unit.

- o The proposals should address how schedules/milestones will potentially be affected. The fact that concurrence of all project managers would be required in accordance with Section 7.2.4. of the Agreement should be presented. For example, removal action in the 300 Area trenches must be discussed in terms of meeting existing milestones. The proposal for pump and treatment of ground water in the 100-N Area should reference potential impacts on planned geohydrological studies.
- o The November 30 and December 6 cover letters propose a 30-day parallel review period. We do not see the advantages in proposing remedial activities to the public prior to the agencies agreeing on priorities, and the best course(s) of action. This process could raise substantial questions by the public that the agencies could have difficulty in providing clear answers. At this time, Ecology will not review and approve an IRA proposal that has not had prior approval by USDOE. Ecology recommends adherence to requirements set forth in the NCP and the Agreement.

The review periods for the public must be consistent among all proposals.

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### Specific Comments

These comments are not intended to be inclusive of all concerns, but serve as examples of issues that should be addressed in the final IRA proposals.

#### 618-9 BURIAL GROUND

- o There is no evidence of leakage, and the drums may be structurally sound as to preclude the need for immediate pumping. However, pumping appears to have been determined necessary before adequate site characterization has occurred. The text should be modified.
- o The site evaluation includes exposing and pumping out the drums, although the site evaluation would be completed prior to regulatory approval (Section 4.5). However, Section 4.3.4 states that removing liquids from the drums would be part of implementation of the IRA, which would require regulatory approval. The latter is correct, and the former is not, i.e., pumping the drums prior to regulatory approval is contrary to the Agreement and CERCLA.

#### N-SPRINGS GROUNDWATER

- o We concur the N-Springs discharge represents one of the most serious environmental threats emanating from the Hanford Site, and support interim remedial action at this site. However, the measure of remedial success needed, and the ability to meet those objectives using pump and treat technology must be assessed. Contaminants other than Strontium-90 that can be removed using an ion exchange column should be addressed.

#### 300 AREA PROCESS TRENCH

- o Continued discharge after excavation might cause further environmental degradation. This point should be addressed in the proposal.
- o The depth and extent of contamination in the trenches is poorly defined, and the measure of success desired in removal actions has not been addressed. Therefore, the volume of excavation needed is unknown, and the anticipated degree of remediation cannot be determined. These questions cannot be answered without further study, but the proposal text does not reflect these uncertainties. In fact, a proposal of \$1.0 M dollars has been tentatively allocated for this remedial action with little explanation of what is to be accomplished.

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Wisness, S.

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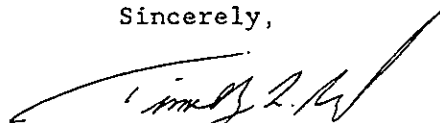
- o It is assumed in Section 4.4.3 that this IRA would be conducted as a CERCLA activity under EPA lead, although the trenches are a RCRA interim status facility. The state has jurisdiction over waste removed from the trenches, and this fact should be noted in the proposal.
- o Section 4.1 states the proposed action is not expected to interfere with remedial activities within the 300-FF-1 Operable Unit. However, it was stated at the December 3, 1990 Interim Response Actions meeting held in Richland that dredging the trenches and placing the excavated sediments in the North Pond was considered a viable and attractive option. Placement of large volumes of wastes in the North Pond would certainly affect operable unit remedial activities.
- o The North Pond alternative will not meet the reduction of waste measure of success identified in Section 4.2 of the proposal.
- o It is not clear in the proposal where 1000 cu. yd. of dry waste, 4000 drums of hazardous waste, and 4000 drums of mixed waste will be stored or treated. There should be at least several options presented at this point in the process.

#### 200-W CARBON TETRACHLORIDE


- o The proposal should discuss more fully the potential to address ground water contamination in addition to vadose zone contamination. Why, for example, is ground water remediation deemed to complex due to the presence of radioactive contaminants?
- o The criteria for discontinuing treatment is ill-defined in Section 4.4.4. and should be expanded.

We look forward to the meeting scheduled for December 14, 1990 in Kennewick in order to discuss the IRA program in general, and our concerns in particular. If you have questions before then, please contact Larry Goldstein at (206) 438-7018.

Sincerely,



Timothy L. Nord  
Hanford Project Manager  
Nuclear & Mixed Waste Management

cc: Roger Stanley  
Paul Day, EPA  


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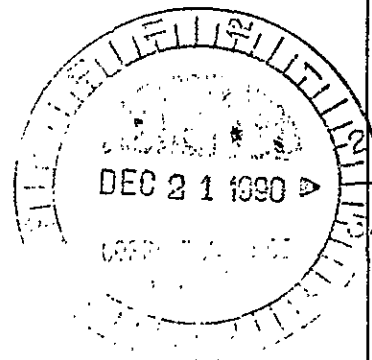
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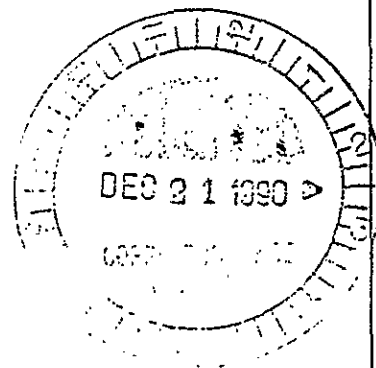
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